

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

JOANN ERHARDT,

Plaintiff,

VS.

THERAPEUTIC PROGRAMS, INC.,

Defendant.

CASE NO.: 2:06CV807-ID

**LIMITED APPEARANCE TO FILE
UNOPPOSED MOTION FOR ADDITIONAL TIME TO RESPOND
TO PLAINTIFF'S COMPLAINT**

COMES NOW Bruce J. Downey, III, attorney for the Defendant, for the limited purpose of filing this motion. Defendant Therapeutic Programs, Inc. moves the Court to allow an additional two weeks for the Defendant to respond to Plaintiff's complaint. As grounds therefore, Defendant shows as follows:

1. The Defendant has not finally selected the attorney to represent it in this matter.
2. Plaintiff's counsel has been consulted and does not oppose this request.
3. No person will be prejudiced by this short delay.

THEREFORE, the Defendant requests the Court to allow the Defendant to file its response on or before October 16, 2006.

s/Bruce J. Downey, III
BRUCE J. DOWNEY, III
ASB-9205-W86B
Attorney for Defendant
Therapeutic Programs, Inc.

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have on this the 28th day of September, 2006 electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Jay Lewis, Esq.
Law Offices of Jay Lewis, LLC
P.O. Box 5059
Montgomery, AL 36103

s/Bruce J. Downey, III
OF COUNSEL